

August 16, 2013

Dr. Jelena Hartman
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670-6114

Via Email: jhartman@waterboards.ca.gov

Subject: Comments on the Draft Templates submitted by the East San Joaquin Water Quality Coalition as required by the Waste Discharge Requirements General Order R5-2012-0116

Dear Dr. Hartman:

The Sacramento River Source Water Protection Program (SRSWPP) appreciates the opportunity to provide comments on the Draft Templates submitted by the East San Joaquin Water Quality Coalition (Coalition) as required by their Waste Discharge Requirements General Order for the Irrigated Lands Regulatory Program. The SRSWPP strives to protect the quality of the Sacramento River water supplies of the Cities of Sacramento and West Sacramento, Sacramento County Department of Water Resources, and East Bay Municipal Utility District for the current and future generations. We serve drinking water to more than 600,000 people in Northern California. We have been tracking the development of the East San Joaquin Water Quality Coalition Order, because we anticipate that it will be precedent setting for other orders in the Irrigated Lands Regulatory Program. We plan to review similar templates for orders in the Sacramento Valley and may have additional comments in the future.

We have reviewed the Draft Templates, as well as the comments prepared by Regional Board Staff in June 2013. We concur with the Regional Board comments and assume that Board staff is working with the Coalition to revise the templates accordingly. Since our primary concern is related to potential impacts to surface water, we have focused our review and comment on the Farm Evaluation and Sediment and Erosion Control Plan (SECP) templates. Our comments are provided for your consideration.

General Comments:

1. The SRSWPP agrees with Regional Board that instructions to the growers on how to complete the templates need to be provided. We would also suggest that the instructions should provide clarification on what would trigger an update to the Farm Evaluation or the SECP by the grower.
2. We understand that the templates are not documents that will be updated annually, so we are uncertain how a grower would report any deviations from the management

practices outlined in these templates to the Coalition for consideration in assessing impacts for the Annual Reports.

Farm Evaluation:

1. We recommend that the form request that the City and County location of the farm be provided, this may assist in locating the Assessor Parcel Numbers (APNs) more quickly if needed.
2. In Part A, Item #4 – Pesticide Application Practices, we would suggest the use of the term “are used” instead of “apply” in the title to better characterize what practices are actually implemented.
3. In Part A, Item #4 – Pesticide Application Practices, we believe there is opportunity to collect information that may better assist in assessing water quality issues if they should arise and to relate management practices to water quality. We would suggest that this section should be completed more similar to the Part B, and may be best implemented using tabular format. We believe that the specific fields should be directly comparable to several key criteria, including acreage, crop grown, management practices (irrigation, pesticide application, and nitrogen application), discharge point, and downstream waterbodies. The Water Board will only be able to evaluate pesticide monitoring data if the information provided links specific management practices with the application of the pesticide, the crop treated, and the discharge location.
4. In Part A, Item #4 – Pesticide Application Practices we believe that there are additional practices, or more specific details of the practices, which are not listed here that would be helpful in assessing impacts, if they should occur. This would include things such as pesticide application method/procedure, implementation of “hold times”, implementation of County specific practices from Department of Pesticide Regulation (DPR) or Agricultural Commissioners (e.g., buffers), and proximity of aerial spraying to surface water. Regional Board may consider if this information is appropriate to collect here or require its collection if there is an identified water quality impact.
5. Part A, Item #6 – Discharge Sediment Potential appears to be a very general question that could be misunderstood. We recommend that the Coalition add significant information here to clarify methods to make this determination and that this includes fields, roads, stream crossings, and discharge points. We also believe that this section should specify which locations/APNs are impacted so that they can be included in the SECP.
6. Part C – Map should also show areas of Erosion Potential identified in Part A, Item #6. Since the map is critical for identifying and locating potential sources of impact to water quality, we support that this document should be submitted to Regional Board and be made available to the public.

SECP:

1. Sediment and Erosion Control Practices Checklist – Irrigation Practices Section: We suggest that there should be a specific practice listed to coordinate irrigation and rainfall prediction to prevent over-irrigation and runoff.
2. Sediment and Erosion Control Practices Checklist – Irrigation Practices Section: We suggest that the item for lengthening time between pesticide application and irrigation should be expanded and/or clarified to include manufacturer/DPR/County Agricultural Commissioner requirements.
3. We suggest that another section should be added for practices related to the non-agriculture sediment areas, such as roads and stream crossings.
4. The last page of the template includes two questions to give a narrative discussion on the impacted areas and the practices implemented. We suggest that a table would be a better fit here as well, perhaps referencing a map also.

Please do not hesitate to contact Elissa Callman at 916-808-1424 or ecallman@cityofsacramento.org if you have any questions on our comments or need additional information.

Sincerely,



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